

AARON D. FORD  
Attorney General  
Jared M. Frost (Bar No. 11132)  
Senior Deputy Attorney General  
State of Nevada  
Office of the Attorney General  
1 State of Nevada Way, Suite 100  
Las Vegas, NV 89119  
Telephone: (702) 486-3177  
Facsimile: (702) 486-3773  
E-Mail: [jfrost@ag.nv.gov](mailto:jfrost@ag.nv.gov)  
*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ALBERT BROWN, an individual; and ARSEMA HAGOS,

Case No. 2:24-cv-01994-BNW

## Plaintiffs,

vs.

THE STATE OF NEVADA EX REL. NEVADA  
STATE POLICE HIGHWAY PATROL; officer  
DANIEL S. MAREK, in his individual capacity,

#### Defendants.

**STIPULATION AND ORDER  
TO EXTEND TIME FOR  
DEFENDANTS' TO RESPOND  
TO COMPLAINT**

Plaintiffs ALBERT BROWN and ARSEMA HAGOS (“Plaintiffs”), by and through counsel, TAYLOR N. JORGENSEN, ESQ., and Defendants STATE OF NEVADA EX REL. NEVADA STATE POLICE HIGHWAY PATROL and DANIEL S. MAREK (“Defendants”), by and through counsel, AARON D. FORD, Nevada Attorney General, and JARED M. FROST, Senior Deputy Attorney General, hereby stipulate and agree to extend the time for Defendants to file a response to Plaintiffs’ Complaint (ECF No. 1-2) for an additional fifty-eight (58) days as calculated from October 30, 2024. Plaintiff made service attempts on Defendants State of Nevada and Daniel Marek on September 27, 2024, and Defendants removed this action to federal court on October 23, 2024. Defendants request a new response deadline of December 27, 2024.

111

1        This request is submitted pursuant to Local Rules IA 6-1 and 6-2 and is Defendants'  
2 first request for an extension of time to respond to the Complaint. Good causes exist for  
3 this extension. Defendants' counsel needs additional time to consult with Defendants to  
4 prepare and complete a response to the Complaint. The parties also need additional time  
5 to address any outstanding service defects and to explore the possibility of early resolution  
6 through negotiation. This Stipulation is sought in good faith and not for undue delay.

7        DATED this November 7, 2024.

8        LARGOMARSINO LAW

10      By: /s/ Taylor N. Jorgensen

11      Taylor N. Jorgensen, Esq., SBN 16259  
12      3005 West Horizon Ridge Pkwy, Suite 241  
13      Henderson, NV 89052

14      *Attorneys for Plaintiffs*

7        DATED this November 7, 2024.

8        AARON D. FORD  
9        Nevada Attorney General

10      By: /s/ Jared M. Frost

11      Jared M. Frost, SBN 11132  
12      Senior Deputy Attorney General  
13      Office of the Nevada Attorney General  
14      1 State of Nevada Way, Suite 100  
15      Las Vegas, NV 89119

16      *Attorneys for Defendants*

17      **ORDER**

18      **IT IS SO ORDERED.** Defendants shall file their response to the Complaint on or  
19      before December 27, 2024.

20      DATED: November 8, 2024

21        
22      UNITED STATES MAGISTRATE JUDGE